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Attorneys for Petitioners  
GORDON RAMSAY AND  
GORDON RAMSAY HOLDINGS LTD.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

In re Application of:

GORDON RAMSAY and  
GORDON RAMSAY HOLDINGS LTD.

Case No. CV 11-80196

**STIPULATION AND ~~PROPOSED~~  
ORDER RE:  
JOINT ADMINISTRATIVE MOTION OF  
GORDON RAMSAY AND  
GORDON RAMSAY HOLDINGS LTD.  
AND GOOGLE INC.  
TO RESOLVE PETITION**

Petitioners Gordon Ramsay and Gordon Ramsay Holdings Ltd. and Google Inc., by and  
through their undersigned counsel, hereby stipulate as follows:

1. Within ten (10) days of receiving an email at the email address google-legal-  
support@google.com from the email account adamjhutcheson@gmail.com that states that the  
accountholder, Adam Hutcheson, expressly consents to Google Inc. disclosing the content of the  
email and attachments previously or currently stored in the account, including the content the user  
may have deleted but that may remain reasonably accessible on Google's active servers, to the  
accountholder's attorney, Smeetesh Kakkad, Salans, Millennium Bridge House, 2 Lambeth Hill,  
London EC4V 4AJ, UK, skakkad@salans.com, and entry of the Stipulation and Order Re: Joint

1 Administration Motion of Gordon Ramsay and Gordon Ramsay Holdings Ltd. and Google Inc. to  
2 Resolve Petition ("Order"), Google Inc. shall disclose this content to the accountholder's attorney,  
3 Smeetesh Kakkad.

4 2. Within ten (10) days of receiving an email at the email address google-legal-  
5 support@google.com from the email account chris.hutcheson2@gmail.com that states that the  
6 accountholder, Christopher Hutcheson, expressly consents to Google Inc. disclosing the content  
7 of the email and attachments previously or currently stored in the account, including the content  
8 the user may have deleted but that may remain reasonably accessible on Google's active servers,  
9 to the accountholder's attorney, Smeetesh Kakkad, Salans, Millennium Bridge House, 2 Lambeth  
10 Hill, London EC4V 4AJ, UK, skakkad@salans.com, and entry of this Order, Google Inc. shall  
11 disclose this content to the accountholder's attorney, Smeetesh Kakkad.

12 3. Google Inc. shall have no obligation under paragraph 1 or 2 above until the entry  
13 of the Order and until it receives, from the email account identified in the paragraph, an email  
14 expressly consenting to the disclosure of the content of the email and attachments previously or  
15 currently stored in the account, including the content the user may have deleted but that may  
16 remain reasonably accessible on Google's active servers, to the accountholder's attorney,  
17 Smeetesh Kakkad, Salans, Millennium Bridge House, 2 Lambeth Hill, London EC4V 4AJ, UK,  
18 skakkad@salans.com.

19 4. Within four (4) days of Google making a consent-based disclosure under  
20 paragraph 1 or 2, counsel for Google will provide a summary of the number of email files and the  
21 total volume of production to counsel for the accountholders as identified above and to Ramsay's  
22 counsel, Elizabeth M. Rotenberg-Schwartz, Mishcon de Reya New York LLP, 200 Park Avenue,  
23 44th Floor, New York, NY 10166, Elizabeth.Rotenberg-Schwartz@mishcon.com.

24 5. This Stipulation and Order resolves the Petition for An Order Compelling  
25 Discovery in Aid of a Foreign Judicial Proceeding Pursuant to 28 U.S.C. Section 1782 brought by  
26 ///

1 Gordon Ramsay and Gordon Ramsay Holdings Ltd., and the Petition is now moot.

2 SO STIPULATED AND AGREED

3  
4 DATED: September 26, 2011

BERGESON, LLP

5 /s/

Jaideep Venkatesan

6 Attorneys for Gordon Ramsay and  
7 Gordon Ramsay Holdings Ltd.

8 In accordance with General Order No. 45, Rule X, the above signatory attests that  
9 concurrence in the filing of this document has been obtained from the signatory below.

10  
11 DATED: September 26, 2011

/s/

Timothy L. Alger

13 TIMOTHY L. ALGER, CA State Bar. No.  
160303

14 TAlger@perkinscoie.com

15 RYAN T. MRAZIK, WA State Bar. No. 40526

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16 PERKINS COIE LLP

1201 Third Avenue, Suite 4800

17 Seattle, WA 98101

18 Attorneys for Google Inc.

19 PURSUANT TO STIPULATION, IT IS SO ORDERED.

20  
21 DATED: Ugr vgo dgt"4: , 2011

22 

23 The Honorable RcwU01 tgy cn  
24 UNITED STATES OCI KVTCTVG JUDGE